



518-97-0681
Answers
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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SEP 4 1997

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

Lynn R. Jones, Environmental Manager
Southwest Shipyard, L.P.
18310 Market Street
Channelview, TX 77530

Dear Mr/Mrs. Jones:

Thank you for your letter to Michael Shapiro, Director of the Office of Solid Waste, dated August 13, 1997, in which you inquired about the status of washwaters from barge cleaning operations.

From your letter, I understand that you operate a barge cleaning and repair facility in Texas which cleans out barges which usually carry petroleum or chemical products. When the barge arrives at your facility for cleaning, there is between 500-1500 gallons of commercial product heel remaining in the barge. The heel is then removed and the recovered commercial product is then sold or returned to the manufacture's facility for reprocessing. After the commercial product heels have been removed the barge is then washed with hot or cold water. The washwater is then either, 1) processed through the onsite wastewater treatment system for the biodegradable portion); or 2) transported offsite to a permitted treatment, storage, or disposal facility (TSDF) for the non-biodegradable portion.

As you may know, Section 3009 of the Resource Conservation and Recovery Act (or RCRA), grants authority to States to run their own RCRA programs, in lieu of the federal program. As such, authorized states implement the RCRA program in their states and make determinations based upon site specific conditions. Because the State of Texas is authorized under RCRA and is aware of these specific factors in your situation, we believe the State is in the best position to make the regulatory determination on the status of the washwater.

We are aware of the uncertainties surrounding this issue of barge-cleaning residues. In the future, the Agency hopes to examine this subject in more depth as resources allow. If you have

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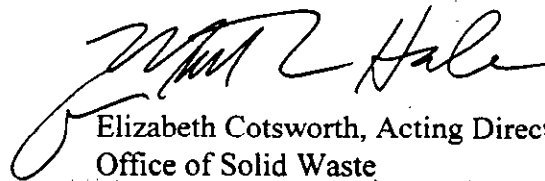


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further questions, please do not hesitate to contact Allen Maples of my staff in the Office of Solid Waste. He can be reached at telephone number (703) 308-8798. Thank you for your interest in the safe management of hazardous waste.

cc: John Sadler, State of Texas (TNRCC)
Sam Coleman, Region VI (EPA)

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Elizabeth Cotsworth", is written over the typed name.

Elizabeth Cotsworth, Acting Director
Office of Solid Waste